

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Donavon D. Law

Case: 2:21-mj-30274

Judge: Unassigned,

Case No. Filed: 06-02-2021 At 04:26 PM

IN RE: SEALED MATTER(CMP)(MLW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 30, 2021 in the county of Washtenaw in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

18 U.S.C. § 922(g)(1)

*Offense Description*

Possession of a firearm by a convicted felon

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: June 2, 2021City and state: Detroit, Michigan*Complainant's signature*

Candace A. Booth, Special Agent (ATF)

*Printed name and title**Judge's signature*

Hon. Anthony P. Patti, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Candace A. Booth, being first duly sworn, hereby depose and state as follows:

**I. Introduction**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), currently assigned to the Ann Arbor, Michigan, Field Office. I have been an ATF Special Agent since 2009. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Before working for the ATF, I was a U.S. Border Patrol Agent. I have participated in numerous state and federal investigations including narcotics trafficking, illegal firearms possession, firearms trafficking, shooting investigations, as well as other types of criminal investigations. Because of my involvement in these and other investigations, I have sworn to a number of federal search and arrest warrants.

2. This affidavit is in support of a complaint and arrest warrant for Donavon D. LAW. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

3. ATF is currently conducting a criminal investigation concerning Donavon D. LAW for a violation of 18 U.S.C. § 922 (g)(1) (possession of a firearm by a person previously convicted of a crime punishable by imprisonment for a term exceeding one year).

4. The facts in this affidavit are based on my personal knowledge and observations, my review of law enforcement reports, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

## **II. Summary of Investigation**

5. On April 30, 2021, the Washtenaw County Sheriff's Office Community Action Team (CAT) was investigating a shooting that occurred on April 8, 2021 in Superior Township, Ypsilanti Township, and Ypsilanti City. CAT identified Donavon D. LAW as a person of interest in this investigation based on a review of open source social media posts. In the course of its review, CAT discovered posts from what appeared to be LAW's social media accounts regarding having a Sig Sauer pistol. CAT conducted a LEIN check on LAW which showed a warrant for LAW's arrest regarding a probation violation in Wayne County. CAT contacted Wayne County and confirmed that this warrant was valid and outstanding.

6. On April 30, 2021, CAT was conducting covert surveillance in Ypsilanti Township. During the surveillance, Deputy Traskos observed LAW driving a gray Saturn Vue. CAT initiated a traffic stop on the Saturn Vue. Deputy Traskos saw LAW reach towards the center console of the vehicle. Deputy Traskos approached the passenger side of the vehicle, while Deputy Hogan approached the driver (LAW). The front passenger was a juvenile, later identified as LAW's child. Deputy Hogan made contact with the driver, who was identified as LAW. Deputy Hogan stated aloud that there was a handgun in the center console of the vehicle. Deputy Traskos looked down and observed the grip of a black handgun on the center console of the vehicle.

7. Sargent Arts and Deputy Hogan took LAW into custody. Deputy Hogan secured the firearm. Sargent Arts then searched LAW for additional contraband or weapons and discovered a 9mm round of ammunition in LAW's hoodie pocket. Deputy Hogan searched the vehicle for additional contraband or weapons and located an extended "Pro Mag" magazine.

8. The firearm seized from the vehicle LAW was driving is a Sig Sauer, model P226, serial number UU628285, 9mm caliber handgun. The firearm is engraved on the slide with the letters WCS5570. The firearm was reported stolen out of Southfield Police Department on August 31, 2020. The reported stolen firearm was a duty issued weapon out of Wayne County Sheriff's Office.

9. During this investigation, I conducted a criminal history check of Donavon D. LAW. This data showed that LAW had been convicted, in the state of Michigan, of the following felony offenses:

- a. 2010- Felony Home Invasion, 2<sup>nd</sup> Degree
- b. 2019- Felony Weapons- Firearms Possession by a Felon
- c. 2019- Felony Breaking & Entering a building with Intent
- d. 2020- Felony Breaking & Entering a building with Intent

10. I spoke with ATF Special Agent (SA) Michael Bolf who is a Firearms Interstate Nexus expert. SA Bolf stated that from the information I provided him, and based on his training and experience, the above described firearm was manufactured outside the state of Michigan, and therefore traveled in or affected interstate or foreign commerce. The firearm is a “firearm” as defined in 18 U.S.C. § 921.

### **III. Conclusion**

11. Based upon the above information, I believe probable cause exists to issue a warrant for the arrest of Donavon D. LAW, charging him with possession of a firearm after having been convicted of a crime punishable by imprisonment for a


term exceeding one year, in violation of 18 U.S.C. § 922 (g)(1). This violation occurred in the Eastern District of Michigan.

Respectfully submitted,



Candace A. Booth, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



Hon. Anthony P. Patti  
United States Magistrate Judge

Date: June 2, 2021